



HON. SYLVIA O. HINDS-RADIX  
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**LAW DEPARTMENT**  
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March 5, 2024

**VIA ECF**

Hon. Colleen McMahon  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *D.P. v. N.Y.C. Dep't of Educ.*, 23-cv-11039 (CM)(KHP)

Dear Judge McMahon:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs, and expenses for legal work on an administrative proceeding under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write on behalf of all parties to respectfully request an adjournment, *sine die* of the Initial Pretrial Conference (IPTC) currently scheduled for March 14, 2024. Your Honor's January 3, 2024 Order (ECF 5) specified that if a proposed Case Management Plan (CMP) is submitted at least two business days prior to the scheduled IPTC and approved by the Court, the IPTC will be cancelled automatically. Pursuant to section IV (J) of Your Honor's Individual Rules, the parties submitted a jointly proposed briefing schedule for a motion for summary judgment instead of CMP (ECF 10). Accordingly, the parties respectfully request that the Court cancel the IPTC, *sine die*.

Thank you for considering this request.

Respectfully submitted.

/s/ Marina Moraru

Marina Moraru, Esq.  
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

OK  
Conference cancelled.  
3/5/2024